



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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May 1, 2003

Mr. Brian Saunders
Raybestos Products Company
1204 Darlington Avenue
Crawfordsville, IN 47933

Re: 107-17259-00007
Third Administrative Amendment to
Part 70 Permit T107-6838-00007

Dear Mr. Saunders:

Raybestos Products Company was issued a Part 70 Permit on April 14, 1999 for an automotive parts manufacturing operation. A letter requesting the following changes was received by IDEM, OAQ on February 21, 2003:

- (a) The replacement of the two (2) existing thermal and catalytic oxidizer VOC control devices in the Department 05 AT adhesive roll coating lines (P012 - C, D, H and I) with a single, more fuel efficient regenerative thermal oxidizer (RTO). The two (2) existing thermal and catalytic oxidizer to be replaced have 90% overall control efficiency and the proposed RTO will achieve at least 90% overall control of the VOC emissions from all AT (Department 05) adhesive roll coating lines and associated curing ovens. The proposed replacement of the control devices will not cause an increase in VOC emissions or trigger any additional regulatory / compliance requirements. In addition, the source is requesting the removal of the adhesive spray booth identified as P012 (F) from Section D.3 of the permit. This booth has been permanently shut down and is no longer present at the plant. The requested changes will therefore be viewed as a descriptive change. Pursuant to 326 IAC 2-7-11(a)(7), an Administrative Amendment to Part 70 Permit T107-6838-00007 is hereby approved as follows:

Item (10) in both Section A.2 and "Facility Description" of Section D.3 has been revised as follows:

- (10) One (1) adhesive rollcoating operation, identified as P012, with a maximum capacity of 40,000 steel discs per hour, consisting of the following equipment:
- (A) One (1) HD rollercoater and oven, installed prior to 1974;
 - (B) One (1) HD dual rollercoater and oven, installed prior to 1974;
 - (C) One (1) AT rollercoater and oven, installed in 1976, using a **natural gas fired regenerative thermal catalytic** oxidizer as control;
 - (D) One (1) AT dual rollercoater and oven, installed in 1976, using a **natural gas fired regenerative thermal catalytic** oxidizer as control;
 - (E) One (1) Rayflex rollcoater, installed in 1974, identified as P004;
 - (F) ~~One (1) adhesive spray booth, installed in 1964, using dry filters as control;~~
 - ~~(G)~~ One (1) sample department rollcoater, installed in 1995;

- (GH) One (1) rollcoating adhesive application system, identified as an addition to P012, with maximum coating rate of 18,000 steel parts per hour, equipped with a natural gas fired **regenerative** thermal oxidizer for VOC and HAP control, with maximum heat input capacity no greater than 8 million British thermal units per hour;
- (HH) One (1) natural gas fired cure oven, rated at 1.6 million British thermal units per hour;
- (IJ) One (1) Mini coater for black resin, installed prior to 1974;
- (JK) One (1) Union Tool rollcoater, installed prior to 1974;

(b) The following compliance testing requirement is applicable to the new regenerative thermal oxidizer.

D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within 60 days of achieving maximum production, the Permittee shall perform VOC testing to show compliance with Condition D.3.1 and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) for the one (1) rollcoating adhesive application system (the addition to P012) utilizing Method 25, 40 CFR 60, Appendix A, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Alic Bent at (973) 575-2555 x3206, or call (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
AB/EVP

cc: File - Montgomery County
Air Compliance Section Inspector - Eric Courtright
Compliance Data Section - Karen Nowak
Technical Support and Modeling - Michele Boner
Administrative and Development



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PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Raybestos Products Company
1204 Darlington Avenue
Crawfordsville, Indiana 47933**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T107-6836-00007	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: April 14, 1999
First Administrative Amendment 107-11435-00007	Issuance Date: July 28, 1999
First Significant Permit Modification 107-12810-00007	Issuance Date: January 23, 2000
First Significant Source Modification 107-14594-00007	Issuance Date: November 19, 2001
Second Significant Permit Modification 107-14857-00007	Issuance Date: December 4, 2001
First Reopening No.: R 107-13431-00007	Issuance Date: February 7, 2002
Second Administrative Amendment 107-16817-00007	Issuance Date: January 7, 2003
First Minor Source Modification 107-16568-00007	Issuance Date: February 6, 2003
Third Significant Permit Modification 107-16919-00007	Issuance Date: March 10, 2003
Third Administrative Amendment 107-17259-00007	Pages Revised: 1, 9, 47, 48, 49 and 50
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:May 1, 2003

- (C) Two (2) wafer press/graphite spray booths, exhausting to one (1) stack (14112);
 - (D) One (1) graphite spray booth, exhausting to one (1) stack (14113); and
 - (E) Two (2) wafer press/graphite spray booths, exhausting to one (1) stack (14116).
- (10) One (1) adhesive rollcoating operation, identified as P012, with a maximum capacity of 40,000 steel discs per hour, consisting of the following equipment:
- (A) One (1) HD rollercoater and oven, installed prior to 1974;
 - (B) One (1) HD dual rollercoater and oven, installed prior to 1974;
 - (C) One (1) AT rollercoater and oven, installed in 1976, using a natural gas fired regenerative thermal oxidizer as control;
 - (D) One (1) AT dual rollercoater and oven, installed in 1976, using a natural gas fired regenerative thermal oxidizer as control;
 - (E) One (1) Rayflex rollcoater, installed in 1974, identified as P004;
 - (F) One (1) sample department rollcoater, installed in 1995;
 - (G) One (1) rollcoating adhesive application system, identified as an addition to P012, with maximum coating rate of 18,000 steel parts per hour, equipped with a natural gas fired regenerative thermal oxidizer for VOC and HAP control, with maximum heat input capacity no greater than 8 million British thermal units per hour;
 - (H) One (1) natural gas fired cure oven, rated at 2.5 million British thermal units per hour;
 - (I) One (1) Mini coater for black resin, installed prior to 1974;
 - (J) One (1) Union Tool rollcoater, installed prior to 1974;
- (11) One (1) paper saturation operation, identified as P013, with a maximum capacity of 40,400 paper friction products per hour, consisting of the following equipment:
- (A) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16101);
 - (B) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16102);
 - (C) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16103);
 - (D) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16104);
 - (E) One (1) post cure oven, installed in 1988, using a thermal oxidizer as control, exhausting to one (1) stack (16105);

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (6) One (1) general cleaning with solvents operation, installed in 1952, identified as P008, exhausting through roof vents, exits, and entrances.
- (10) One (1) adhesive rollcoating operation, identified as P012, with a maximum capacity of 40,000 steel discs per hour, consisting of the following equipment:
 - (A) One (1) HD rollercoater and oven, installed prior to 1974;
 - (B) One (1) HD dual rollercoater and oven, installed prior to 1974;
 - (C) One (1) AT rollercoater and oven, installed in 1976, using a natural gas fired regenerative thermal oxidizer as control;
 - (D) One (1) AT dual rollercoater and oven, installed in 1976, using a natural gas fired regenerative thermal oxidizer as control;
 - (E) One (1) Rayflex rollcoater, installed in 1974, identified as P004;
 - (F) One (1) sample department rollcoater, installed in 1995;
 - (G) One (1) rollcoating adhesive application system, identified as an addition to P012, with maximum coating rate of 18,000 steel parts per hour, equipped with a natural gas fired regenerative thermal oxidizer for VOC and HAP control, with maximum heat input capacity no greater than 8 million British thermal units per hour;
 - (H) One (1) natural gas fired cure oven, rated at 2.5 million British thermal units per hour;
 - (I) One (1) Mini coater for black resin, constructed prior to 1974;
 - (J) One (1) Union Tool rollcoater, constructed prior to 1974;
- (13) One (1) adhesive/saturant formulation and mixing operation, installed in 1988, identified as P017, with a maximum capacity of 2,000 phenolic adhesives gallons per hour, consisting of the following equipment:
 - (A) One (1) adhesive process kettle, exhausting to one (1) stack (16201);
 - (B) One (1) adhesive process kettle, exhausting to one (1) stack (16202);
 - (C) One (1) adhesive process kettle, exhausting to one (1) stack (16203);
 - (D) One (1) adhesive process kettle, exhausting to one (1) stack (16204);
 - (E) One (1) adhesive process kettle, exhausting to one (1) stack (16205);
 - (F) One (1) adhesive process kettle, exhausting to one (1) stack (16206);
 - (G) One (1) adhesive process kettle, exhausting to one (1) stack (16207);
 - (H) One (1) storage tank, identified as MEK (near rollcoaters), with a maximum capacity of 1,000 gallons of MEK;
 - (I) One (1) storage tank, identified as Ethanol (near rollcoaters), with a maximum capacity of 8,000 gallons of ethanol;
 - (J) One (1) bulk storage tank T-1, containing ethanol, with maximum storage capacity of 12,000 gallons, exhausting to one (1) stack (16159);
 - (K) One (1) bulk storage tank T-2, containing resin, with maximum storage capacity of 13,000 gallons, exhausting to one (1) stack (16160);
 - (L) One (1) bulk storage tank T-3, containing resin, with maximum storage capacity of 11,000 gallons, exhausting to one (1) stack (16161);
 - (M) One (1) bulk storage tank T-4, containing resin, with maximum storage capacity of 4,200 gallons, exhausting to one (1) stack (16162);
 - (N) One (1) bulk storage tank T-5, containing MEK, with maximum storage capacity of 4,500 gallons, exhausting to one (1) stack (16163);
 - (O) One (1) bulk storage tank T-7, containing resin, with maximum storage capacity of 4,500 gallons, exhausting to one (1) stack (16164);

- (P) One (1) bulk storage tank T-6, containing resin, with maximum storage capacity of 4,500 gallons, exhausting to one (1) stack (16165);
- (Q) One (1) day tank T-14, containing blended resin, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16153);
- (R) One (1) day tank T-13, containing blended resin, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16154);
- (S) One (1) day tank T-12, containing blended resin, with maximum storage capacity of 1,500 gallons, exhausting to one (1) stack (16155);
- (T) One (1) day tank T-10, containing blended resin, with maximum storage capacity of 1,500 gallons, exhausting to one (1) stack (16156);
- (U) One (1) day tank T-9, containing blended resin, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16157);
- (V) One (1) day tank T-8, containing blended resin, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16158);
- (W) One (1) day tank T-16, identified as wash out bed 2, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16170); and
- (X) One (1) day tank T-17, identified as wash out bed 1, with maximum storage capacity of 1,000 gallons, exhausting to one (1) stack (16171).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility (the rollcoating adhesive application system (the addition to P012)) engaged in the surface coating of steel parts may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating, excluding water, as applied by the coating applicator for a forced warm air dried system.
- (b) When operating the regenerative thermal oxidizer to achieve the limit for 326 IAC 8-2-9, 3.5 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the regenerative thermal oxidizer shall maintain a minimum 90% overall VOC control efficiency. This efficiency and the use of the regenerative thermal oxidizer are required by 326 IAC 8-1-2(a)(2). Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 90%, the VOC content of the coating shall not exceed 67 pounds per gallon of coating solids delivered to the applicator.
- (c) Pursuant 326 IAC 8-1-2(a)(9), an equivalent emission limit for 326 IAC 8-2-9 may be established based on an actual measured transfer efficiency using EPA approved test methods. This condition must be amended to state any such equivalent limit.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8]

Any change or modification to any of these facilities except the rollcoating adhesive application system (the addition to P012) that would lead to an increase in volatile organic compound (VOC) emissions above twenty-five (25) tons per year must be approved by the Office of Air Management (OAM) before such change or modification can occur.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the one (1) adhesive rollcoating operation and any control devices.

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test the general cleaning with solvents operation and the adhesive/saturant formulation operation by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the volatile organic compound (VOC) limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C -Performance Testing.

D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within 60 days of achieving maximum production, the Permittee shall perform VOC testing to show compliance with Condition D.3.1 and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) for the one (1) rollcoating adhesive application system (the addition to P012) utilizing Method 25, 40 CFR 60, Appendix A, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.3.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.7 Monitoring

Monitoring of the general cleaning with solvents operation and the adhesive/saturant formulation operation is not required by this permit. However, any change or modification to this facility as specified in 326 IAC 2-1 would require this facility to have monitoring requirements.

D.3.8 Volatile Organic Compound (VOC)

Pursuant to Construction Permit (CP 107-8186-00007) issued on June 5, 1997, the regenerative thermal oxidizer for VOC control shall be in operation at all times when the one (1) rollcoating adhesive application system (the addition to P012) is in operation. When the regenerative thermal oxidizer is operating, a minimum operating temperature of 1500F shall be maintained or a temperature, fan amperage and duct velocity determined in the compliance tests to maintain at least 90 percent overall control (including capture and destruction) efficiency of VOC emissions.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1, and D.3.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.3.1, and D.3.2.
 - (1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used:
 - (2) The solvent usage for each month;

- (3) The total VOC and HAP usage for each month; and
 - (4) The weight of VOC and HAP emitted for each compliance period.
- (b) To document compliance with Condition D.3.7, the Permittee shall maintain a daily log of oxidizer operating temperatures.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.